



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
**CHATTANOOGA ENVIRONMENTAL FIELD OFFICE**  
540 McCALLIE AVE., SUITE 550  
CHATTANOOGA, TENNESSEE 37402  
PHONE (423) 634-5745    STATEWIDE 1-888-891-8332    FAX (423) 634-6389

December 1, 2014

Certified Mail

7011 3500 0002 9516 9094

Ms. Donna Luketic  
Site Manager  
Akzo Nobel Surface Chemistry, LLC  
909 Mueller Avenue  
Chattanooga, TN 37406

Re: Compliance Evaluation Inspection (CEI)  
Akzo Nobel Surface Chemistry, LLC  
NPDES Permit: TN0002798  
909 Mueller Avenue  
Hamilton County, TN

Dear Ms. Luketic:

On October 31, 2014, Mr. Michael Bascom of the Division of Water Resources (DWR) performed a Compliance Evaluation Inspection (CEI) of the above referenced site. He met with Marco Salenda of Akzo Nobel Surface Chemistry, LLC (Akzo Nobel) who provided information during the inspection. The purpose of the inspection was to independently determine the facility's compliance with the terms and conditions of the NPDES Permit TN0002798.

**Permit Verification**

NPDES Permit TN0002798 became effective on June 1, 2010 and will expire on April 30, 2014. This permit authorizes the discharge of non-contact cooling water from Outfall 001 and stormwater runoff to South Chickamauga Creek at mile 0.6.

A copy of the Notice of Coverage (NOC) and Notice of Intent (NOI) were available onsite.

The permitted outfalls were examined during the inspection. The outfall number was verified as corresponding with the outfall location listed in the above reference permits.

## **Records and Reports**

Akzo Nobel keeps three years of records and reports as required by the permit. Copies of all original sampling data, operator monitoring, equipment maintenance, and equipment calibration records were reviewed for 2012, 2013 and 2014 were available for review. The facility submits DMRs each month as required by its permit. Mr. Bascom reviewed all data (Temperature, pH and flow volume) for the following months: November 2012, September 2013 and April 2014. He did not find any exceedances or transcription errors.

A copy of the storm water pollution prevention plan (SWPPP) was also available for review. During the inspection, Mr. Bascom reviewed the SWPPP; monthly inspections, quarterly visual inspections, comprehensive site evaluations for 2012, 2013, and 2013. He also reviewed bi-annual stormwater reports and training records.

## **Facility Site Review**

Akzo Nobel is a manufacturer of liquid polymers, SIC 2821 and 2879 located on 32 acres within Hamilton County, TN. The facility employs approximately 89 people and operates 24 hours a day, 5 days a week. Discharge from the site primarily consists of non-contact cooling water and all storm water runoff.

Mr. Salenda stated that all of the facility's stormwater is captured and treated at their onsite pretreatment unit before being sent to Moccasin Bend WWTP (MBWWTP). The City of Chattanooga's pretreatment ordinance does allow contaminated stormwater to be sent to WWTP, however MBWWTP is currently under a consent decree which directs them to eliminate additional sources of inflow. <http://www.chattanooga.gov/public-works/waste-resources/consent-decree>

Mr. Bascom observed a new concrete pad had been installed at the tanker truck loading area. The pad was graded to route spills and stormwater runoff to a sump that runs along the pad. The sump routes stormwater to a concrete stormwater retention basin located on the north side of the facility.

Mr. Bascom observed that the railroad tank car unloading/loading areas had secondary containment. According to personnel, the secondary containment routes spills and stormwater to the concrete stormwater retention basin.

Mr. Bascom observed that all of the facility's tanks containing raw and finished materials had secondary containment. The secondary containment routes spills and stormwater to the concrete retention basin.

## Effluent/Receiving Waters

The sampling location of the outfall was visually inspected during the CEI. Mr. Bascom observed that the effluent at Outfall 001 was clear and did not contain any visible floating solids, scum, foam, or sheens.

## Flow Measurement

Flow at Outfall 001 is measured at the sampling location using a Parshall flume. The instantaneous flow measurement device is a staff gauge. Mr. Bascom observed that the walls of the Parshall flume were covered with algae. The walls should be cleaned as this can affect the flow measurement.

## Self-Monitoring Program

Onsite personnel take grab samples of effluent weekly to measure pH and temperature of effluent. In a review of facility records, Mr. Bascom found that although personnel were calibrating their pH measurement equipment daily, technicians who take grab samples for pH were not documenting the time of the grab or the pH measurement. According to 40 CFR 136.7, pH measurement of grab samples must occur within 15 minutes of taking the sample. Effluent temperature at Outfall 001 is measured with a digital thermometer. The thermometer is calibrated by a third party annually.

## Laboratory

Onsite personnel collect samples of effluent for Whole Effluent Testing which is conducted by Empirical Laboratories LLC of Nashville, TN. Onsite personnel follow proper chain of custody procedures.

NOTE: On May 18, 2012, the U.S. EPA amended 40 CFR 136.7. Copies of the revised procedures can be obtained here: <http://www.tn.gov/environment/fleming/wwinfo.shtml>

Table 1. Results of Whole Effluent Testing IC25 at 001		
Sample	<i>P.promelas</i>	<i>C.dubia</i>
November 2013	> 15.2%	>15.2%
October 2012	>18.8%	> 18.8%

## Operation and Maintenance

The facility appeared to be well maintained.

## **Stormwater Pollution Prevention Plan (SWPPP)**

The facility does not discharge stormwater. All stormwater is captured in a retention basin and routed to onsite pretreatment before being sent to Moccasin Bend WWTP. Mr. Bascom reviewed a copy of the Akzo Nobel's Storm Water Pollution Prevention Plan (SWPPP). The SWPPP did not contain a certification statement or non-stormwater certification statement. The pollution prevention team roster was current. Additionally, it contained inventories of types of material handled and their associated potential of release to stormwater, loading and unloading operations and list of significant spills.

During the inspection, Mr. Bascom reviewed bi-annual inspections and training records. The facility conducts monthly visual inspections of its outfall because the facility discharges to Exceptional Tennessee Waters (TMSP General Permit Master Document Section 4.6). In a review of annual stormwater reports, Mr. Bascom found that they all had been marked No Discharge.

### **Spills or Incidents**

None.

### **Pollution Prevention**

Mr. Bascom did not observe drums with raw material stored outside. Mr. Bascom did not observe accumulations of any materials in walkways or open areas between process areas. All stormwater is captured in a retention basin and routed to onsite pretreatment before being sent to Moccasin Bend WWTP.

### **Violations:**

- Failure to document time of pH measurement at Outfall 001

### **Required Actions:**

- Please meet with the City of Chattanooga's MBWWTP pretreatment personnel before January 16, 2015 and discuss whether the facility should continue sending all of its stormwater to MBWWTP as this could conflict with the requirements of their Consent Decree
- The facility must revise its procedures and forms to incorporate a requirement for personnel to record the time of pH sampling and pH measurement
- Please revise your SWPPP to include the certification and non-stormwater certification statements
- Please clean the walls of the Parshall flume

**Additional Comments:**

On October 7, 2010, the U.S. EPA amended the date by which facilities must prepare or amend Spill Prevention, Control, and Countermeasure (SPCC) Plans, and implement those Plans. The new compliance date for Spill Prevention Control and Countermeasures is November 10, 2011.

[http://www.epa.gov/oem/docs/oil/spcc/spcc\\_extfs.pdf](http://www.epa.gov/oem/docs/oil/spcc/spcc_extfs.pdf)

This letter provides a record of the October 31, 2014 Compliance Evaluation Inspection.

The Division would like to thank Marco Salenda for his time and assistance during our inspection. If you have any questions concerning either our inspection or this report, please contact Mr. Bascom at (423) 634-5710.

Sincerely,



Jennifer Innes  
Environmental Program Manager  
Division of Water Resources

cc: Mounir Minkara, Ph.D., Water Quality Manager, City of Chattanooga via email  
Richard Tate, Pretreatment Supervisor, City of Chattanooga via email